

FCC  
Washington, DC

GN Docket No 12-91

Comments from Mark Barnhard, KD5AIV:

1.

a. Experience in Arkansas is that Amateur Radio is often called upon during severe weather/tornado events, flooding, ice storms and other incidents that may involve the need for replacement or supplemental communications.

b. Amateur Radio provides a free, interoperable communication service that does not need to draw staffing from supported agencies that are usually already stressed by an ongoing incident. We are able to add to the mix of communications channels and can often add support for agency staff by operating some of their still workable gear as well as Amateur Radio equipment.

c. & f. Amateur Radio is included as an ESF-2 Function in the training material. Despite some resistance to it, I believe that the DHS/FEMA NIMS courses required for NIMS Compliance are worthwhile for Amateur Radio operators who desire involvement in emergency communications because they provide a good overview of where communication and Amateur Radio fit in the big picture of an incident response no matter where it occurs..

d. We have an Operation Plan and MOU with the state emergency management agency and many of our county units use or are learning to use the Amateur Radio resources available to them. More needs to be done at the local level to include Amateur Radio in the regular exercises done at the local and regional levels.

e. I believe that allowing agency staff (i.e.: employees) to use the Amateur Radio Bands as a supplement to their Public Safety/Part 90 systems has hurt Amateur Radio's effectiveness in emergency and disaster response. Agencies have the ability to enhance existing systems or add new ones within their own Bands but too often they now just get employees licensed and buy Amateur Radio equipment. But their employees rarely learn to be effective Amateur Radio operators. They don't develop the skills and don't practice integrating with local Amateur Radio groups and nets. They are often an impediment to Amateur Radio's ARES/RACES response.

g. Since Amateur Radio is being called upon to replace/supplement the existing communications, the most common and pressing need is for tactical voice communications. Emergencies are local, and local public safety communication almost entirely consists of short voice information.

h. It seems to me that the Amateur Radio community has developed means/modes or asked for regulatory changes to allow them to develop them – as needed. That process seems to be working as long as needed changes are reviewed and approved in a timely manner.

i. At present, much of the interconnect between Amateur Radio and our served agencies takes place face-to-face at a Command Post or EOC. There are times when it would be advantageous to have the ability to talk directly via radio. Generally we are side by side even in the field and simply swap radio microphones when needed. Allowing Amateur Radio operators to use the National Interop frequencies would help – especially in situations when Amateur Radio operators are deployed outside their home areas.

j. Much like fire and law enforcement personnel or doctors or lawyers, I think that certification should be a state or local function – based on national guidelines – but certified by the state. Each state has different laws, customs and support systems and even though Amateur Radio will always be an ESF-2 function the specifics of certification and gaining access to incident areas should be up to the states and counties.

2.

a. As we shopped for a home a decade ago, many of the neighborhoods did not allow antenna structures at all or only allowed the small satellite dishes or small over-the-air TV antennas. Larger masts or towers were forbidden. Some of the restrictions also included any antennas attached to trees. Fortunately, we found a home with no restrictions, but it was not easy.

b. Short of total removal of antenna structure and attachment restrictions, I am not sure what the best method of accommodating both the needs of the Amateur Radio operator and the neighborhood would be. Perhaps a neighborhood council or committee could provide guidance, but there would have to be some sort of appeal process other than the courts.

c. It might be reasonable for Amateur Radio operators to co-locate VHF/UHF repeaters along with existing services, provided the site owners would cooperate. But the individual HF/VHF/UHF stations that are used from the home need to be at the home site and the antennas utilized must be a very short distance from the transmitters.

d. It is local property restrictions that prevent many Amateur Radio operators from utilizing the best antenna systems available to them. The FCC, via its PRB-1, has encouraged governments to allow antenna systems by not allowing wholesale restrictions. Now that same basic concept needs to be applied to all rules governing property. The FCC also encourages experimentation and preparedness, both of which are inhibited by CC&Rs and other property restrictions.

e. Amateur Radio is harshly impacted in its ability to respond when operators are not allowed to use their equipment at home. Lack of efficient antenna systems due to restrictions means that large portions of our cities and even some rural areas do not have adequate coverage. There are holes in our weather spotter reporting and holes in damage reporting and disaster response when Amateur Radio operators are not allowed to match the best antenna systems to their transmitters.

f. While Amateur Radio operators are very resourceful and often find ways to get some sort of antenna into operation even in restricted areas, not being able to use better systems limits their effectiveness during emergency situations. The lack of a PRB-1-like law or regulation hampers many operators or forces them to find homes in areas other than their preferred locations.

Respectively submitted,

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